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VIA ECF

Hon. Katherine H. Parker, U.S.M.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

MEMO ENDORSED

Re: Jose Mario Perez, Jr. v. 581 2ND Ave, LLC and E & E Restaurant 2, LLC

Case No.: 1:24-cv-08558 (AS) (KP)

Dear Judge Parker:

This firm represents Defendant E & E Restaurant 2, LLC in this matter. We write jointly with counsel for Plaintiff Jose Mario Perez ("Plaintiff") and Co-Defendant 581 2ND Ave, LLC to respectfully request an adjournment of the April 24, 2025 in-person settlement conference to the afternoon of July 9, 11 or 17. The parties also respectfully seek a corresponding adjournment of the April 17, 2025 pre-conference submissions deadline.

The parties seek this extension because the first mutually available date for Plaintiff's accessibility expert to conduct a site inspection was April 23, 2025, which is the day before the currently scheduled settlement conference. The Parties believe that the inspection and the expert's report will be useful during settlement negotiations. Therefore, the Parties request an adjournment to allow Plaintiff's expert time to complete the inspection, prepare a report, and circulate it before the conference.

The Parties have conferred and are all available to attend the in-person settlement conference, on the afternoon of the following dates: July 9, 2025; July 11, 2025; or July 17, 2025.

This is the Parties first request for an adjournment of the settlement conference. We thank Your Honor for your consideration of the Parties request.

Respectfully submitted, KAUFMAN DOLOWICH LLP

Jennifer E. Sherven Solomon Abramov

cc: All counsel of record (via ECF)

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APPLICATION GRANTED: The settlement conference in this matter scheduled for Thursday, April 24, 2025 at 10:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Wednesday, July 9, 2025 at 10:00 a.m. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Preconference submissions must be received by the Court no later than July 2, 2025 by 5:00 p.m.

APPLICATION GRANTED

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Hon. Katharine H. Parker, U.S.M.J.

04/16/2025